

# **C. Cotton Decl. Exhibit 16**



December 31, 2025

VIA ELECTRONIC MAIL

Christopher V. Cotton

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Re: *In re: Uber Technologies, Inc.*, No. 2:23-md-03084-CRB (N.D. Cal.)

Counsel:

I write to initiate a meet and confer regarding Plaintiffs listed in Attachment 1. PTO #5 requires each Plaintiff to “submit a bona fide ride receipt” from an Uber trip connected to the alleged incident. PTO #5, ¶ 4 (ECF 175). The listed Plaintiffs have been identified in association with a violation of PTO #5 regarding the production of a bona fide ride receipt. It is Defendants’ position that these cases should be dismissed with prejudice and that a limited and narrowly tailored deposition of Plaintiff with MDL ID 4243 be permitted to investigate the origin of the fraudulent ride receipts.

I have included all law firms representing Plaintiff on Attachment 1 on this communication, as well as Plaintiffs’ MDL leadership in the transmittal. Given the fast-moving nature of this docket and impending trials in this matter, it is imperative that we meet and confer on these issues promptly. I can make myself available most times this week to accommodate the group’s schedules,

**SHOOK**  
HARDY & BACON

as well this coming Monday. Please provide your availability to meet and confer within this timeline.

Best regards,



Christopher V. Cotton  
Partner

**ATTACHMENT 1**

1. 3698 – Pulaski Law Firm, PLLC
2. 3700 – Pulaski Law Firm, PLLC
3. 4243 – Pulaski Law Firm, PLLC
4. 3879 – Reich and Binstock, LLP
5. 4142 – Reich and Binstock, LLP
6. 4097 – Wagstaff Law Firm
7. 4385 – Wagstaff Law Firm